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Attorney for Plaintiffs,
ROBERT "SONNY" WOOD and ACCESS MEDICAL, LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ROBERT "SONNY" WOOD, an individual;
ACCESS MEDICAL, LLC, a Delaware
limited liability company,

Plaintiffs,

vs.

NAUTILUS INSURANCE COMPANY, an
Arizona corporation; and DOES I through X,
inclusive; and ROE CORPORATIONS I through
X, inclusive,

Defendants.

Case No.: 2:17-cv-02393-MMD-CWH

**STIPULATION AND [PROPOSED] ORDER FOR AN EXTENSION OF TIME FOR
ACCESS MEDICAL, LLC AND ROBERT WOOD, II TO RESPOND TO NAUTILUS
INSURANCE COMPANY'S MOTION TO DISMISS AND MOTION TO STRIKE AND
FOR NAUTILUS INSURANCE COMPANY TO REPLY TO THE ACCESS MEDICAL,
LLC AND ROBERT WOOD, II'S OPPOSITIONS TO NAUTILUS INSURANCE
COMPANY'S MOTION TO DISMISS AND MOTION TO STRIKE**

(FIRST REQUEST)

1 The parties hereto, by and through their undersigned counsel, herewith stipulate for an
2 extension of deadlines associated with Defendant Nautilus Insurance Company's ("Nautilus's")
3 Notice of Motion and Motion to Strike Allegations in Plaintiffs' Second Amended Complaint
4 and Defendant Nautilus's Motion to Dismiss Plaintiffs Robert "Sonny" Wood and Access
5 Medical, LLC's Second Amended Complaint (collectively "Motions"), which were both filed on
6 October 25, 2018. This is the first stipulation for extension of time. The date that Mr. Wood and
7 Access Medical, LLC's Oppositions to the Motions ("Oppositions") are due is currently
8 November 8, 2018. Based on the Insureds filing the Oppositions on date of the current deadline,
9 Nautilus's Replies to the Insureds' Oppositions ("Replies") would be due on November 15,
10 2018.

11 The parties seek to extend the time for filing the Oppositions and Replies in order to
12 allow the parties an opportunity to meet and confer on the subject Motions and engage in further
13 meet and confer efforts regarding the parameters of the disclosure of documents during
14 discovery. Moreover, allowing additional time for the parties to file the applicable Oppositions
15 and Replies allows the parties the opportunity to fully address all of the legal issues presented.

16 In light of Defendant Nautilus's Motions, which were filed and served on October 25,
17 2018, the parties agree to stipulate to continue the following deadlines:

- 18 1. The due date for Robert "Sonny" Wood ("Wood") and Access Medical, LLC
19 ("Access") Oppositions to the Nautilus's Motion to Strike and Nautilus's Motion to
20 Dismiss is continued from November 8, 2018 to November 28, 2018.
- 21 2. The due date to Nautilus's Replies to Wood and Access's Oppositions to
22 Nautilus's Motion to Strike and Nautilus's Motion to Dismiss is December 19, 2018,
23 twenty-one days after the due date for the Insureds' Oppositions.

24 **IT IS SO STIPULATED.**

25 ///

26 ///

Dated this 31st day of October, 2018.

/s/ L. Renee Green, Esq.

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ROBERT "SONNY" WOOD and ACCESS

MEDICAL, LLC

Dated this 31st day of October, 2018.

/s/ Linda Wendell Hsu, Esq.

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NAUTILUS INSURANCE COMPANY

ORDER

IT IS SO ORDERED.

Dated this 31st day of October, 2018.



UNITED STATES DISTRICT COURT JUDGE